

**REMARKS**

This Amendment is filed in response to the Office Action dated September 6, 2005. All objections and rejections are respectfully traversed.

Claims 1-42, 45-58, and 60-70 are pending in the case.

Claims 1, 26, 63 and 68 were amended to better claim the invention.

No new claims were added.

At Page 2 of the Office Action, claims 1-9 and 26-27 were objected to because of use of the words “adapted to”. Amendment of the claims is believed to satisfy this objection.

At Page 3 of the Office Action Claims 1-10, 17, 18, 24-27, 30-42, and 45-58 were rejected under 35 U.S.C. 102(b) as being anticipated by Blaum, et al. U. S. Patent No. 5,579,475 issued November 26, 1996 (hereinafter Blaum).

The present invention, as set out in representative claim 1, comprises in part:

1. A system to correct multiple storage device failures in a storage array using a combination of multiple first parity groups and a single secondary parity group, the system comprising:

*a storage array having a plurality of concatenated sub-arrays, each sub-array including a set of data storage devices and a first parity storage device, the array further including a global secondary storage device associated with the storage array and holding secondary parity values for the single secondary parity group, the secondary parity values computed across the concatenation of the sub-arrays.*

Blaum discloses a single set of M disks, and having both row and diagonal parity computed for the single set of disks.

Applicant respectfully urges that Blaum is silent concerning Applicant's claimed novel

*a storage array having a plurality of concatenated sub-arrays, each sub-array including a set of data storage devices and a first parity storage device, the array further including a global secondary storage device associated with the storage array and holding secondary parity values for the single secondary parity group, the secondary parity values computed across the concatenation of the sub-arrays.*

That is, Applicant claims a plurality of *concatenated sub-arrays, each sub-array including a set of data storage devices and a first parity storage device.* In contrast,

Blaum has only one set of disks, and the one set of disks has a single set of row parity computed for it. Blaum is entirely silent concerning Applicant's claimed novel *concatenated sub-arrays*.

Further, Blaum is silent concerning Applicant's claimed *a global secondary storage device associated with the storage array and holding secondary parity values for the single secondary parity group, the secondary parity values computed across the concatenation of the sub-arrays*.

That is, Applicant stores *secondary parity values* on *a global secondary storage device associated with the storage array*. And Applicant computes *the secondary parity values computed across the concatenation of the sub-arrays*. Not only does Blaum not have sub-arrays, but Applicant claims *the secondary parity values computed across the concatenation of the sub-arrays*.

Accordingly, Applicant respectfully urges that Blaum is legally precluded from anticipating the presently claimed invention under 35 U.S.C. 102 because of the absence from Blaum of any disclosure of Applicant's claimed novel

*a storage array having a plurality of concatenated sub-arrays, each sub-array including a set of data storage devices and a first parity storage device, the array further including a global secondary storage device associated with the storage array and*

*holding secondary parity values for the single secondary parity group, the secondary parity values computed across the concatenation of the sub-arrays.*

At Page 8 of the Office Action Claims 11-16, 19-23, 28, 29, and 60-70 were allowed.

All independent claims are believed to be in condition for allowance.

All dependent claims are dependent from independent claims which are believed to be in condition for allowance. Accordingly, all dependent claims are believed to be in condition for allowance.

Favorable action is respectfully solicited.

PATENTS  
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Respectfully submitted,

A handwritten signature in cursive script, appearing to read "A. Sidney Johnston", written over a horizontal line.

A. Sidney Johnston

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